From: Jeff Lewellin

To: Gary Moore/R6/USEPA/US@EPA; Susan Clewis

Cc: Carlton (Buddy) Stanley; Raul Rodriguez; Lori Wooten; Russell Lewis

Subject:

Date: 01/07/2003 04:50 PM

## Gary:

It's coincidental that you called Susan today about NORCO. I was at a meeting today (1/7/03) and a law enforcement officer expressed concerns that tanker trucks were entering the facility at night and he didn't notice them entering during the day. I thought this warranted an investigation so I went to the site and observed or noted the following issues:

1. A representative of Superior Oil indicated that the trucks were legitimate and that they were delivering oil around the clock to the tanks that are operational and being utilized by the two oil companies at NORCO. I had no reason to not believe that and oil was being delivered (3 tankers) while we were there.

2. They were installing piping and a 400 barrel tank to meter the oil into the tanks being utilized by Superior and the other operator at the facility. To my knowledge, only the tanks you are aware of are being utilized to store oil by these two companies.

3. The dismantling of the facility is proceeding but it still appears to be at a slow pace.

4. Tank 31 appears to have been emptied and dismantled. I saw a large pile of metal where the tank was and it was indicated that it was dismantled.

5. Tank 27 has had additional oil overflow during a rain event and the vegetation is oiled with a minor amount of PSH observed inside the dike area. I went to the wetland side of the tank and no oil had gotten outside the containment.

6. That is the only dismantling activity I observed in the refinery area proper. This was a cursory

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6. That is the only dismantling activity I observed in the refinery area proper. This was a cursory inspection of activities ongoing in the refinery. All other activities ongoing at the time of the investigation were associated with the bulk oil marketing companies mentioned above.

7. Across the road in the tank farm, some progress has been made. Two of the tanks in the area of tanks 4, 5, 6, & 7 have the bottom hatches removed so they are presumed to be empty.

8. No new leaks or spills were observed in this area.

9. The 3 smaller tanks adjacent to the loading rack also appear to have been entered and emptied because bottom hatches on the tanks only had to bolts each with nuts on them so I assume the hatches were taken off and the tanks emptied.

That's really the only information I could get without Mike Ward on the site. If you come to the area to look at the site, give me a call. Thanks, JCL

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